

Green Infrastructure Statement

Land North of Bronwylfa Road, Rhostyllen, Wrexham

Innova Renewables Developments propose to develop the land north of Bronwylfa Road for the installation and operation of an Energy Storage System (ESS). This will include energy storage units, substation, site access, cable connection, landscaping and ancillary infrastructure.

This Green Infrastructure Statement has been prepared by Etive Ecology Ltd to inform the planning application. The statement reflects the guidance and requirements outlined in Chapter 6 of Planning Policy Wales (PPW); relating to distinctive and natural places.

The application site north of Bronwylfa Road has been subject to a suite of ecological surveys and assessments, throughout 2022 and 2023. These have comprised a preliminary ecological walkover in May 2022 and detailed Extended Phase 1 Habitat Survey and bat detector surveys in 2023. The site and immediately adjacent land have been found to support the following key ecological features;

- Species-rich native hedgerows.
- A bat roost in one tree 50m to the south of the site.
- Bat foraging and commuting habitat along the northern site boundary.
- Bat flight path across the eastern end of the site.
- Potential for further bat roosts within trees along the proposed cable corridor routes.

The main body of the site was found to be an active agricultural field, of very low ecological value and actively contributing to the release of carbon (through frequent ploughing), the increase in surface water runoff and sediment mobilisation (through frequent removal of surface vegetation and the exposure of soils), the loss of invertebrate populations (through pesticide application) and the nutrient enrichment of local habitats and water-ways (through the application of fertilisers).

The proposed scheme seeks to follow the Step-Wise Approach as detailed within the updated Chapter 6 of PPW.

1. Avoid; the vast majority of the development footprint sits within the main body of the site which is identified as being of lowest ecological value and of no ecological significance.
2. Minimise; where the development footprint, including the cable route(s) needs to cross existing hedgerow or established trees, these areas have been reduced in footprint and the most mature and high value trees have been avoided altogether, including their root protection areas. Trenchless techniques will be utilised wherever possible along the cable route(s) to minimise hedgerow losses.
3. Mitigate; habitat creation works have been designed into the site layout to mitigate for the small losses in hedgerow along the western site boundary and other hedgerows along the cable route(s). Habitat creation includes hedgerow enhancement planting along the retained southern and western hedgerow sections, as well as woodland structure planting along the western edge of the development. Furthermore, additional tree planting to the east will enhance the bat flight path across the site and pockets of vegetation along the northern boundary will be allowed to regenerate naturally. All habitat measures will be subject to a

long-term habitat management plan, which will include ecological monitoring. All 'mitigation' for losses to the development are deemed to have been incorporated within the application site boundary.

4. Compensation; no compensation for biodiversity impacts are considered to be necessary, given the relatively small scale biodiversity impacts anticipated from the proposed scheme. As noted, above, appropriate and proportionate mitigation has been delivered on-site through habitat creation, enhancement and long-term management.

The proposed scheme recognises the need to achieve a Net Benefit for Biodiversity and from the outset, this has been built into the planning of the project. It is recognised that the footprint of the scheme removes 5.5ha of improved grassland used for agricultural purposes. Whilst the positive effects of removing this land from intensive agricultural management are noted above, the applicant aims to deliver genuine biodiversity enhancements at the local scale by offering an area of land for long-term ecological enhancement to the west of the main site. The area proposed comprises a 4.54ha intensively managed agricultural field, which will be subject to initial enhancements (tree planting, pond creation and bund creation) and long-term conservation management.

The proposed ecological enhancements fit with the DECCA Framework by;

1. Increasing diversity within local ecosystems by providing a species-rich grassland under low intensity management. This will offer a habitat that is rare in the local area and will therefore have the potential to support a different and more diverse assemblage of species.
2. Increasing the extent/scale of ecosystems by providing a single large block of habitat, rather than small and discreet parcels of land. The proposed site links existing woodland and hedgerows, therefore extending the scale of existing ecosystems and green infrastructure.
3. Improving the condition of ecosystems by bringing the site under long-term conservation management, to be specified within a Habitat Management Plan with clearly defined aims, actions and targets.
4. Improving connections within and between ecosystems, but creating a dedicated block of habitat that links the existing woodland corridor to the north with a small water-course and an existing established hedgerow in the south.
5. Improving ecosystem resilience and adaptability to future pressures, through the planting of trees (carbon capture, shading), the management of surface water runoff (continued vegetation cover, protection of water-course to the south) and the creation of topographical variations capable of offering niche habitats to a wide range of flora and fauna.

Therefore, as a result of the ecological measures embedded within the proposed scheme, it is expected that there will be a demonstrable net benefit for biodiversity. The site has been identified as being of relatively low value, with immediate on-site impacts adequately mitigated on-site and net gain being achieved primarily through off-site measures, on land immediately adjacent to the development. All habitats retained/created/enhanced on site, as well as the off-site ecological enhancement area, will be subject to a long-term Habitat Management Plan, with defined biodiversity targets and key performance indicators.